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May 28, 2019

VIA ECF

Magistrate Judge James Orenstein
United States Courthouse
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York

Re: Florencio et al v. Flor Azteca Deli & Grocery Inc. et al,
18-cv-06619-ILG-JO

Dear Judge Orenstein:

Defendants Flor Azteca Deli & Grocery Inc., Sandra Gonzalez, and Juan Tendia (collectively, “Defendants”) and Plaintiffs Rudy Florencio and Oscar Guerra (collectively, “Plaintiffs”) jointly request a sixty (60) day extension of the current discovery deadline in order to engage in settlement negotiations. Defendants have made an Offer of Judgment and the parties are in discussions to find a compromise in this matter.

As the Court is aware, discovery is set to close on May 31, 2019. *See* Scheduling Order, ECF No. 19. We request a sixty (60) day extension of the discovery deadline through and including July 30, 2019. We also request that the that the Court adjourn and reschedule our Pretrial Conference currently scheduled for June 12, 2019, to a time that the Court finds appropriate based on the new proposed schedule. We do not believe that this request requires the extension of any other deadlines in this matter. This is both parties’ first request for an extension of the discovery deadline and it is jointly made.

The parties have engaged in substantial discovery, including exchange of written discovery and the production of documents. The parties have conferred several times during the current discovery period and are working amicably together. However, due to the parties’ ongoing settlement discussions and

Defendants' Rule 68 Offer of Judgment, the parties have currently postponed scheduling of depositions for both Plaintiffs and Defendants in the hopes of reaching an agreement. As such, an extension would allow for the completion of discovery without prejudicing either party.

Thank you in advance for your consideration and courtesy with regard to this request.

Respectfully submitted,

/s/ Leonor H. Coyle
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